

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

**FILED**  
JAN 13 2020  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY *[Signature]* DEPUTY CLERK

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT**

**ANDRE OMAR MARTIN (1)**  
**JESSE SOLOMON DOMINGUES (2)**  
**MARCUS TREVIN WOODS (3)**

CASE NUMBER: **W20-009M**

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about January 11, 2020, in Bell County, in the Western District of Texas defendant(s), aided and abetted by each other, intentionally and knowingly entered or attempted to enter a bank, credit union, or savings and loan association, or any building used in whole or in part as a bank, credit union, or as a savings and loan association, with intent to commit in such bank, credit union, or in such savings and loan association, or building, or part, thereof, so used, any felony affecting such bank, credit union, or such savings and loan association and in violation of any statute of the United States, or any larceny, in violation of Title 18, United States Code, Sections 2 and 2113(a).

I further state that I am a(n) Task Force Officer, Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHED AFFIDAVIT**

continued on the attached sheet and made a part hereof: YES

  
\_\_\_\_\_  
JOSEPH FIEDLER, Task Force Officer  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

January 13, 2020

Date


Jeffrey C. Manske

U.S. Magistrate Judge

Name & Title of Judicial Officer

Waco, Texas

City and State

  
\_\_\_\_\_  
Signature of Judicial Officer

United States District Court

Western District of Texas, Waco Division

Affidavit

1. Your Affiant is a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been employed as Texas Peace Officer for 22 years and assigned as a TFO with the FBI 2.5 years. Your Affiant is currently assigned to the San Antonio Division, Waco Resident Agency (WRA) in Waco, Texas. Your Affiant is currently assigned to the Violent Crimes Task Force with responsibilities to investigate violent crimes, public corruption, major thefts, robbery, and enforcing federal criminal statutes. As part of these duties, your Affiant has become involved in the investigation of suspected violations of Title 18, United States Code, § 2113(a). The facts in this affidavit come from your Affiant's personal observations, his training and experience, and information obtained from other law enforcement officers and witnesses.
2. The statements contained in this affidavit are based on information provided to your Affiant by other law enforcement officers who investigate these types of crimes and through his personal investigation. Your Affiant has set forth herein the facts I believe are necessary to establish probable cause that said violation does exist.
3. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, your Affiant has not included each and every fact known to him concerning this investigation. Your affiant has set forth only facts that I believe are necessary to establish probable cause.

Background of the Investigation

1. The Federal Bureau of Investigation has been conducting an ongoing investigation in the theft of money from ATM's around the State of Texas. The FBI has obtained information that the persons responsible for these thefts originate from the Houston, Texas area.
2. On the 11<sup>th</sup> of January, 2020, at approximately 3:05 am, the Harker Heights Police Department received a report of a burglary alarm call at the Chase Bank located at 201 East Central Texas Expressway, Harker Heights, Texas. This location is within the Waco Division of the Western District of Texas. Officers were informed that the alarm was coming from the Automatic Teller (ATM) located on the bank property. The alarm company remotely logged into the video surveillance system that monitored the banks security cameras and provided the Harker Heights Police Dispatcher information that there were three males attempting to break into the ATM. The description of the three males was provided to the responding officers as one black male wearing a navy blue sweat shirt, one black male wearing all black clothing and one Hispanic male wearing all black clothing.
3. Upon their arrival to the ATM, responding officers found a white Ford F350 with the engine running hooked to the ATM by a large steel tow chain with tow hooks. The chain was pulled tight by the truck. The ATM machine face had been pried open and an attempt was made to gain entry into the ATM. Officers began to process the scene when they discovered that the white Ford F350

was stolen from the City of Belton, Texas. Officers located a cellular telephone on the driver's floorboard of the truck. The cellular telephone had a clear case on it with a visible State of Texas issued identification card with the photo and name of ANDRE OMAR MARTIN displayed on it. Officer also located a blue crow bar inside the truck used to pry the ATM open. Officers canvassing the area located three gloves, a black face mask and a navy blue sweater lying in the yard on Indian Oaks Drive.

4. While canvassing the neighborhood around the Chase Bank, Officer Ragaisis stopped three males matching the description given by the dispatcher. Officer Ragaisis detained the three males and identified them as ANDRE OMAR MARTIN, JESSE SOLOMON DOMINGUES and MARCUS TREVIN WOODS.
5. ANDRE OMAR MARTIN, a black male whose Texas issued identification card was found inside the Ford F350 that was hooked to the ATM, was wearing a navy blue hoodie that matched clothing worn during the burglary of the ATM and a do-rag on his head black pants and black shoes. ANDRE OMAR MARTIN's shoes were covered with mud. Officers located a pair of grey and black work gloves that are believed to have been shed by ANDRE OMAR MARTIN while fleeing the scene in the yard on Indian Oaks Drive. ANDRE OMAR MARTIN could not offer a reason for being in the area nor provide a connection to the area.
6. JESSE SOLOMON DOMINGUES, a Hispanic male, was wearing a white T-shirt, blue jeans, black shoes and glasses. Officers located a pair of white gloves with orange palms in JESSE SOLOMON DOMINGUES' pockets that matched ones later observed on surveillance footage as being worn by the Hispanic male who was wearing glasses on the surveillance footage. Officers located a navy blue sweater during a canvass that is believed to have been shed by JESSE SOLOMON DOMINGUES while fleeing the scene. JESSE SOLOMON DOMINGUES could not offer a reason for being in the area nor provide a connection to the area.
7. MARCUS TREVIN WOODS, a black male, was wearing a black sweat shirt, black sweat pants with a white marking down each side and white shoes. A search of MARCUS TREVIN WOODS' person found one black and grey work glove in his pocket. The glove found in MARCUS TREVIN WOODS pocket, matched the one found in the yard on Indian Oaks Drive and was for the opposite hand. MARCUS TREVIN WOODS shoes were also covered with mud. MARCUS TREVIN WOODS could not offer a reason for being in the area nor provide a connection to the area.
8. Your Affiant advised ANDRE OMAR MARTIN and MARCUS TREVIN WOODS of their Miranda Warning. ANDRE OMAR MARTIN and MARCUS TREVIN WOODS provided conflicting information as to the reason they traveled from Houston, Texas to Harker Heights, Texas and could offer no explanation for being in the area where they were detained. ANDRE OMAR MARTIN denied leaving his cell phone inside the white Ford F350.
9. Your Affiant advised JESSE SOLOMON DOMINGUES of his Miranda warning and he elected to talk with your Affiant. JESSE SOLOMON DOMINGUES told your Affiant that he (ANDRE OMAR MARTIN) and MARCUS TREVIN WOODS traveled from Houston, Texas to the Killeen area for the purpose of burglarizing ATMs. JESSE SOLOMON DOMINGUES told your Affiant that the three of them used a crow bar to break open the ATM. They then hooked the chain to the ATM and attempted to open it by ripping the insides of the machine out. JESSE SOLOMON DOMINGUES told your Affiant that it was taking too long to breach the ATM so they abandoned the attempt and fled the area. JESSE

SOLOMON DOMINQUES told your Affiant that they had broken into other ATMs in the Central Texas area and that they had stolen approximately \$140,000. JESSE SOLOMON DOMINGUES was shown surveillance images from an ATM theft that occurred in Temple, Texas. JESSE SOLOMON DOMINGUES identified the person in the surveillance image as MARCUS TREVIN WOODS. JESSE SOLOMON DOMINGUES told your Affiant that the ATM theft took place in Temple, Texas.

10. Chase Bank is a federal insured banking institution. The ATM is erected with the boundary of the property that is under the custody and control of Chase Bank.

Conclusion

4. Based upon the aforementioned facts, there is probable cause to believe that one or more violations of 18 United States Code, § 2113(a) have been committed by ANDRE OMAR MARTIN.
5. Based upon the aforementioned facts, there is probable cause to believe that one or more violations of 18 United States Code, § 2113(a) have been committed by JESSE SOLOMON DOMINGUES.
6. Based upon the aforementioned facts, there is probable cause to believe that one or more violations of 18 United States Code, § 2113(a) have been committed by MARCUS TREVIN WOODS.
7. Based upon the aforementioned facts, there is probable cause to believe that ANDRE OMAR MARTIN, JESSE SOLOMON DOMINGUES and MARCUS TREVIN WOODS conspired together to commit a violation of 18 United States Code § 2113(a).
8. Accordingly, your Affiant respectfully requests that an arrest warrant be issued for ANDRE OMAR MARTIN.
9. Accordingly, your Affiant respectfully requests that an arrest warrant be issued for JESSE SOLOMON DOMINGUES.
10. Accordingly, your Affiant respectfully requests that an arrest warrant be issued for MARCUS TREVIN WOODS.

FURTHER AFFIANT SAYETH NAUGHT.



JOSEPH FIEDLER, Task Force Officer  
Federal Bureau of Investigation

SWORN TO AND SUBSCRIBED before me on the 13<sup>th</sup> day of January, 2020.



JEFFREY C. MANSKE  
UNITED STATES MAGISTRATE JUDGE